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*Attorneys For Plaintiff*

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

ADRIAN ROMERO;  
Plaintiff,

vs.

COUNTY OF LOS ANGELES, a  
Public Entity; SERGIO CAMPOS;  
DAMIEN GUERRERO; AND  
JUSTIN PEREZ; and DOES 1 through  
10, inclusive;

Defendants.

CASE NO.: 2:23-cv-02025-GW-PVC  
[Hon. George H. Wu]

**REPORT RE STATUS OF  
SETTLEMENT**

Hearing Date: August 14, 2025  
Time: 8:30 a.m.

**TO THIS HONORABLE COURT:**

Plaintiff ADRIAN ROMERO (“Plaintiff”), by and through his counsel, hereby submits the following status report regarding settlement.

**RECITALS**

1. On January 12, 2024, the parties participated in a mediation with ADR Panel Mediator Richard Copeland and all parties reached a settlement agreement to resolve the matter in its entirety. The Parties signed a stipulation for settlement on that date.

2. The settlement is conditioned upon the approval by the relevant Los Angeles County boards, including the Los Angeles County Claims Board and the Board of Supervisors, which defense counsel will be recommending. According to Defendants’ counsel, the process of obtaining approvals from the Los Angeles County Claims Board and Board of Supervisors was expected to take 9-12 months from the date the settlement agreement was fully executed by the parties.

3. The County received the executed settlement agreement from Plaintiff on June 12, 2024.

4. Defendants’ counsel previously provided the following information (*See* Dkt. 45):

- a. The Los Angeles County Board of Supervisors has established protocols in lawsuits. Where the liability of the settlement or judgment exceeds \$100,000, a Corrective Action Plan (CAP) (a confidential document) and a Summary Corrective Action Plan (SCAP) (a public record) must be produced.
- b. After the subject settlement agreement was fully executed, the settlement moved on to the CAP phase. The CAP process involves several steps in its preparation, including investigation, drafting, and revisions, followed by approval of multiple levels of LASD personnel. The County is in the CAP process phase of the approvals process. Most recently, the draft CAP

1 was reviewed by the CEO and returned to the Los Angeles Sheriff's  
2 Department for revisions.

3 c. The CAP review process has been completed.

4 d. The matter was expected to be placed on the Claims Board agenda for  
5 approval on May 19, 2025.

6 e. After approval by the Claims Board, the matter will typically go before  
7 the Board of Supervisors within approximately 60 days. After the County  
8 Board of Supervisors' approval, the settlement documents and Plaintiff's  
9 payment instructions will be submitted to the Los Angeles County  
10 Auditor-Controller, and then the settlement payment will be issued.

11 5. Plaintiff has not received the settlement funds and does not have any further  
12 information regarding the status of the settlement at this time.

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14 Respectfully Submitted,

15 DATED: August 12, 2025

LAW OFFICES OF DALE K. GALIPO

17 By: /s/ Dale K. Galipo

18 Dale K. Galipo

19 Renee V. Masongsong

20 Attorneys for Plaintiff  
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